

1 Thomas E. Alborg (*Cal. Bar No. 56435*)
2 talborg@avmllp.com
3 **ALBORG, VEILUVA & MARTIN LLP**
4 2121 N. California Boulevard, Suite 1010
Walnut Creek, CA 94596
925-939-9880 Telephone
925-939-9915 Facsimile

5 Brian G. Isaacson (*Pro Hac Vice*)
briani@isaacsonlawfirm.com
6 **ISAACSON LAW FIRM, P.S.**
7 701 Fifth Avenue, Suite 4725
Seattle, WA 98104
206-448-1011 Telephone
206-448-1022 Facsimile

11 *Attorneys for Plaintiffs*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 GREGORY R. RAIFMAN and SUSAN
15 RAIFMAN, husband and wife, individually
and on behalf of their marital community
16 and as Trustees of the RAIFMAN FAMILY
REVOCABLE INTERVIVOS TRUST and
as beneficiaries of the PALLADIAN
17 TRUST; GEKKO HOLDINGS, LLC, and
HELICON INVESTMENTS, LTD,

19 Plaintiffs,

20 vs.

21 WACHOVIA SECURITIES, LLC, N/K/A
WELLS FARGO ADVISORS LLC,

23 Defendant.

Tod Aronovitz (*Pro Hac Vice*)
ta@aronovitzlaw.com
Barbara Perez (*Pro Hac Vice*)
bp@aronovitzlaw.com
Andrew Zelmanowitz (*Pro Hac Vice*)
az@aronovitzlaw.com
ARONOVITZ LAW
2 S. Biscayne Boulevard, Suite 2630
Miami, FL 33131
305-372-2772 Telephone
305-397-1886 Facsimile
John A. Yanchunis (*Pro Hac Vice*)
jyanchunis@forthepeople.com
MORGAN & MORGAN, P.A.
201 North Franklin Street, 7th Floor
Tampa, Florida 33602
813-223-5505 Telephone
813-223-5402 Facsimile

Case No.: No. C 11-02885 SBA

**STIPULATION TO ENLARGE
PLAINTIFFS' TIME TO FILE
REPLY IN SUPPORT OF PLAINTIFFS'
MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Action filed: April 1, 2011

[Removed from California State Court]

Hon. Saundra B. Armstrong

Whereas, on January 14, 2013, Plaintiffs, Gregory L. Raifman and Susan Raifman, husband and wife, individually and on behalf of their marital community and as Trustees of

1
27 STIPULATION TO ENLARGE PLAINTIFFS' TIME TO FILE REPLY IN SUPPORT
28 OF PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

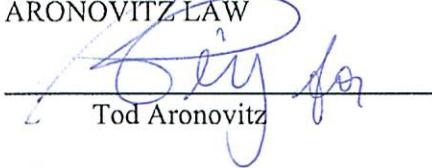
1 The Raifman Family Revocable Intervivos Trust, as beneficiaries of The Palladian Trust, as
2 sole members of Gekko Holdings, Ltd., and assignees in interest and beneficial owners of
3 Helicon Investments, Ltd. (collectively, "Plaintiffs"), filed their Motion for Leave to File a
4 Proposed Second Amended Complaint ("Motion") in this action;

5 Whereas, Plaintiffs' Reply in support of the Motion is due on February 22, 2013
6 pursuant to Federal Rule of Civil Procedure 15(a)(3); and

7 NOW, THEREFORE, the parties, through their counsel, hereby stipulate and agree,
8 pursuant to Local Rule 6-1(b), that Plaintiffs shall have until February 26, 2013, to file their
9 Reply in support of said Motion. This extension will not alter the date of any event or deadline
10 already fixed by Court Order.

11 DATED: February 7, 2013

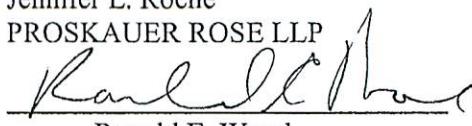
Tod Aronovitz
Barbara Perez
Andrew Zelmanowitz
ARONOVITZ LAW


Tod Aronovitz

16 Attorneys for Plaintiffs,
17 GREGORY R. RAIFMAN, SUSAN RAIFMAN
18 GEKKO HOLDINGS, LLC, and
19 HELICON INVESTMENTS, LTD.

20 DATED: February 7, 2013

Ronald E. Wood
Jennifer L. Roche
PROSKAUER ROSE LLP


Ronald E. Wood

24 Attorneys for Defendant,
25 WACHOVIA SECURITIES, LLC

1 PURSUANT TO STIPULATION, IT IS SO ORDERED
2

3 DATED: 2/12/13

4 
5 Hon. Saundra J. Armstrong
6 United States District Judge
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28